

**AMENDMENT**  
**USSN 09/801,382**

As a preliminary matter, new claims 65-69 are added herein, to claim aspects of the present invention not previously claimed. Support for the new claims may be found in the specification, for example, at page 3, lines 19-29 and at page 6, lines 16-19. No new matter is added herein.

Claims 31-64 stand rejected under 35 U.S.C. §112, second paragraph as allegedly being indefinite. In particular, the Action indicates that the claims define a luminescent material layer that emits light upon activation with light, which is allegedly contrary to the dictionary definition of luminescence which is the emission of light by chemical action, friction or electrical action. Applicants respectfully traverse this rejection and request reconsideration and withdrawal thereof.

Contrary to the Examiner's assertion, the term "luminescence" embraces luminescent materials that emit light upon activation with light. Such a process is routinely referred to as photo-luminescence. As support, Applicants submit herewith the relevant portion of Hawley's Condensed Chemical Dictionary (13<sup>th</sup> Ed.), which define "Luminescence" as follows:

The emission of visible or invisible radiation unaccompanied by high temperature by any substance as a result of absorption of exciting energy in the form of photons, charged particles, or chemical change. It is a general term that includes both fluorescence and phosphorescence. Special types are chemiluminescence, bioluminescence, electroluminescence, photoluminescence, and triboluminescence.

Attached as Appendix I is a copy of the definition from Grant & Hackh's Chemical Dictionary, which defines "luminescence" as follows:

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Emission of light under the influence of various physical agents; as mechanical (**tribo** ~), electrical (**electro** ~), radiant (**photo** ~), thermal (**thermo** ~) or chemical (**chemi** ~) means. Cf. *baroluminescence*, *candoluminescence*, *fluorescence*, *phosphorescence*. **cathodo** ~ Emission of light due to electron or ion bombardment. **chemi** ~ Emission of light by chemical reaction without appreciable temperature increase; as by luminol. Cf. *phosphorescence*. **crystallo** ~ Emission of light during crystallization; as, arsenous acid from hydrochloric acid solution. **electro** ~ (1) Emission of light due to passage of electricity through gases at low pressure and temperature; as, in vacuum tubes. (2) L. produced by a phosphor-treated surface in contact with an electrically conducting surface, e.g., conductive glass, to which an electric potential is applied. Used for electric signs. **photo** ~ Emission of light on exposure to invisible radiation, by transfer from one wavelength into another; as, ultraviolet into visible rays. **radio** ~ Emission of light by radioactive substances. **thermo** ~ Emission of light after slight heating; as, by chlorophane. **tribo** ~ Emission of light by friction or other mechanical means without temperature rise; as, with quartz.

From these representative definitions, it is clear that the terms "luminescence" and "fluorescence" are not mutually exclusive. In fact, these definitions show that the phenomenon that is embraced by the term "fluorescence" is also embraced by the term "luminescence."

Applicants do not rely solely on the definitions submitted herewith, but rely on them insofar as they are evidence as to what would be understood by one skilled in the art.

Because those skilled in the art would understand that a luminescent material layer may emit light upon activation, the claims are definite and withdrawal of the only outstanding

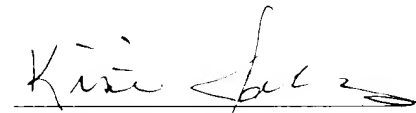
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rejection is believed to be appropriate. Further, the claims are believed to be in condition for allowance. Accordingly, allowance of the application is respectfully requested.

The Examiner is invited to contact the undersigned at (202) 220-4255 to discuss any matter regarding this application.

Respectfully submitted,  
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